### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHRISTOPHER MANHART,

Plaintiff,

v.

WESPAC FOUNDATION, INC.; STUDENTS FOR JUSTICE IN PALESTINE; DISSENTERS; JEWISH VOICE FOR PEACE; TIDES CENTER, d/b/a COMMUNITY JUSTICE EXCHANGE; JINAN CHEHADE; SUPERIOR MURPHY; RIFQA FALANEH; and SIMONE TUCKER,

Defendants.

No. 24-cv-8209-MMR-KHH

### JOINT STATUS REPORT

Plaintiff Christopher Manhart and Defendants Tides Center d/b/a Community Justice Exchange (the "Tides Center"), Jinan Chehade, Superior Murphy, Rifqa Falaneh, Simone Tucker ("Individual Defendants"), Dissenters, Jewish Voice for Peace, and WESPAC Foundation Inc., by and through their counsel, submit this Joint Status Report in response to the Court's August 7, 2025 order (Dkt. 108) and state as follows:

1. The Parties do not agree on the path forward on all matters pending before the Court. Their respective positions are as follows:

#### **Plaintiff's Position**

2. For the reasons stated in his Motion for Stay of Collateral Proceedings or, in the Alternative, an Extension of Time to File Response ("Manhart's Motion to Stay") (Dkt. 122), Manhart's position is that all pending collateral matters before this Court should be stayed pending a ruling from the Seventh Circuit on Plaintiff's

appeal of the Court's decision on Defendants' motions to dismiss. Manhart's preference is for a full stay, but if collateral proceedings are not fully stayed, then there should be no stay to avoid piecemeal appeals.

# **Defendants' Position**

- 3. On the issue the Court directed the parties to file a status report on—"whether, because of an appeal, the deadline regarding fees should be stayed" (Dkt. 108)—Defendants agree that the determination of the amount of fees and procedure under Local Rule 54.3 with respect to this Court's order granting the sanctions motions of the Tides Center, the Individual Defendants, and Dissenters should be stayed pending a ruling from the Seventh Circuit on Plaintiff's appeal of the Court's decision on Defendants' motions to dismiss.
- 4. WESPAC and JVP believe that the briefing on their pending motions for sanctions should not be stayed and will file a response to Manhart's Motion to Stay.

Dated: August 28, 2025

Respectfully Submitted,

By: /s/ Theodore H. Frank

Theodore H. Frank
Neville S. Hedley
HAMILTON LINCOLN LAW INSTITUTE
1629 K Street NW, Suite 300
Washington, DC 20006
(703) 203-3848
ted.frank@hlli.org
ned.hedley@hlli.org

M. Frank Bednarz
HAMILTON LINCOLN LAW INSTITUTE
1440 W. Taylor Street #1487
Chicago, IL 60607
(801) 706-2690
frank.bednarz@hlli.org

Max Schreiber (pro hac vice)
HAMILTON LINCOLN LAW INSTITUTE
5868 E. 71st Street, Suite E-709
Indianapolis, IN 46220
(401) 408-9370
max.schreiber@hlli.org

Attorneys for Plaintiff

By: /s/ Precious S. Jacobs-Perry

Precious S. Jacobs-Perry Ali I. Alsarraf JENNER & BLOCK LLP 353 North Clark Street Chicago, IL 60654 (312) 222-9350 pjacobs-perry@jenner.com aalsarraf@jenner.com

Counsel for Defendant Tides Center

By: /s/ M. Porter

M. Porter Attorney-at-Law PO Box 330059 Brooklyn, NY 11233 port.cjm@gmail.com (872) 246-3379

Amanda S. Yarusso 1180 North Milwaukee Avenue Chicago, IL 60642 (773) 510-6198 amanda.yarusso@gmail.com

Counsel for Defendants Jinan Chehade, Superior Murphy, Rifqah Falaneh, Simone Tucker, and Dissenters

# By: /s/ Nora Snyder

Nora Snyder
Brad J. Thomson
People's Law Office
1180 N. Milwaukee Ave
Chicago, IL 60642
773-235-0070
norasnyder@peopleslawoffice.com
brad@peopleslawoffice.com

By: /s/ Hanna Chandoo

Hanna Chandoo Dan Stormer Hadsell Stormer Renick & Dai, LLP 128 N Fair Oaks Ave Pasadena, CA 91103 (626) 585-9600 hchandoo@hadsellstormer.com dstormer@hadsellstormer.com

Attorneys for Defendant Jewish Voice for Peace

By: /s/ Robert L. Herbst

Robert L. Herbst rherbst@herbstlawny.com 420 Lexington Avenue, Suite 300 New York, New York 10170 Tel: 914-450-8163

Fax: 888-482-4676

Attorneys for Defendant WESPAC Foundation